**Appendix A: Intel's Objections to BIAX's Proposed Changes To Its Contentions**

| | Intel's Objections to BIAX's Proposed Changes for '755 Patent, Itanium and Itanium 2 | | |
|---|---|---|---|
| **Location of Change in BIAX Ex. D (Part 1 of 3)** | **Nature of Change to Contention** | **Basis For Objection** | **Cite to Public Document (where applicable)** |
| Pg. 1, block 2, line 1 | Insert a contention covering Itanium's assembler | This is a substantive change to BIAX's infringement theory. BIAX seeks to accuse a new or different structure by adding a contention covering the Itanium assembler in addition to the Itanium compiler. | Ward Decl. Ex. N, *Intel® Itanium™ Architecture Assembly Language Reference Guide*, at 31-33 (2001) |
| Pg. 1, block 2, line 3-4 | Change the contention from covering Itanium's execution units to covering Itanium's issue ports | This is a substantive change to BIAX's infringement theory. BIAX seeks to accuse a new or different structure by changing the contention from covering the Itanium execution units to covering the Itanium issue ports | Ward Decl. Ex. M, *Intel® Itanium® 2 Processor Reference Manual for Software Development and Optimization*, at 26-28 (2004) |
| Pg. 1, block 2, line 5 | Change "architectural stops" to "stop bits' | This is a substantive change to BIAX's infringement theory. BIAX seeks to accuse a new or different structure by changing the identified structure from "architectural stops" to "stop bits". | Ward Decl. Ex. P, Marsha Eng, et. al, *"Mesocode: Optimizations for Improving Fetch Bandwidth of Itanium Processors"*, Workshop on Complexity-Effective Design (WCED), May 2002, at 2. |
| Pg. 3, block 1, line 27 | Insert citation to Itanium assembler code | This citation supports the substantive change to BIAX's infringement theory objected to in the row above. | N/A |
| Pg. 3, block 2, lines 3-4 | Insert a contention covering Itanium's assembler | This is a substantive change to BIAX's infringement theory. BIAX seeks to accuse a new or different structure by adding a contention covering the Itanium assembler in addition to the Itanium | Ward Decl. Ex. N, *Intel® Itanium™ Architecture Assembly Language Reference Guide*, at 31-33 (2001) |

**Intel's Objections to BIAX's Proposed Changes for '755 Patent, Itanium and Itanium 2**

| Location of Change in BIAX Ex. D (Part 1 of 3) | Nature of Change to Contention | Basis For Objection | Cite to Public Document (where applicable) |
|---|---|---|---|
| | | compiler. | |
| Pg. 3, block 2, line 3 and pg. 4, block 1, line 1 | Change citation of "the EXP stage of the pipeline" to "Logic in the IFR (instruction fetch and rotate) unit and ISD(instruction dispersal unit)" | This is a substantive change in BIAX's infringement theory. BIAX seeks to accuse a new or different structure by changing the identified structure from "the EXP stage of the pipeline" to "logic in the IFR…and ISD" | Ward Decl. Ex. Q, *Intel® Itanium® 2 Processor Hardware Developer's Manual*, at 2-4 to 2-5 (2002) |
| Pg. 4, block 1, line 3 | Insert "to issue ports" | This is a substantive change in BIAX's infringement theory. BIAX seeks to accuse a new or different structure by adding a contention that the instructions are delivered "to issue ports." | Ward Decl. Ex. M, *Intel® Itanium® 2 Processor Reference Manual for Software Development and Optimization*, at 26-28 (2004) |
| Pg. 4, block 1, lines 4-6 | Insert citation to Itanium Merced and McKinley code | This citation supports the substantive change to BIAX's infringement theory objected to in the row above. | N/A |
| Pg. 6 block 2, lines 1-4 | Change the contention from covering Itanium's "M units" to covering Itanium's "issue ports … and their associated execution resources". | This is a substantive change in BIAX's infringement theory. BIAX seeks to accuse a new or different structure by changing the identified structure from the "M units" to the "issue ports … and their associated execution resources" | Ward Decl. Ex. M, *Intel® Itanium® 2 Processor Reference Manual for Software Development and Optimization*, at 26-28 (2004) |
| Pg. 6, block 2, lines 4-5 | Insert citation to Itanium Merced code. | This citation supports the substantive change to BIAX's infringement theory objected to in the row above. | N/A |
| Pg. 6, block 2, lines 7-8 | Change the contention from covering Itanium's "M units" to covering Itanium's "ports … | This is a substantive change in BIAX's infringement theory. BIAX seeks to accuse a new or different structure by changing the identified structure from | Ward Decl. Ex. M, *Intel® Itanium® 2 Processor Reference Manual for Software* |

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| | Intel's Objections to BIAX's Proposed Changes for '755 Patent, Itanium and Itanium 2 | | |
|---|---|---|---|
| Location of Change in BIAX Ex. D (Part 1 of 3) | Nature of Change to Contention | Basis For Objection | Cite to Public Document (where applicable) |
| | and their associated execution resources". | the "M units" to the "ports … and their associated execution resources" | *Development and Optimization*, at 26-28 (2004) |
| Pg. 6, block 2, lines 9-10 | Insert citation to Itanium McKinley code. | This citation supports the substantive change to BIAX's infringement theory objected to in the row above. | N/A |
| Pg. 6, block 3, line 1 | Adds contention that the "crossbar connects the" issue ports. | This is a substantive change in BIAX's infringement theory. BIAX seeks to accuse a new or different structure by adding a citation to additional structure in the Itanium processor | Ward Decl. Ex. Q, *Intel® Itanium® 2 Processor Hardware Developer's Manual*, at 2-4 to 2-5 (2002) |
| Pg. 6, block 3, lines 1-2 | Changes identification of the "Instruction Buffer" as the source of instructions to identification of the "ISD unit" as the source. | This is a substantive change in BIAX's infringement theory. BIAX seeks to accuse a new or different structure by changing its identification of accused structure in the Itanium processor. | Ward Decl. Ex. Q, *Intel® Itanium® 2 Processor Hardware Developer's Manual*, at 2-4 to 2-5 (2002) |
| Pg. 6, block 3, lines 3-4 | Changes identification of the Itanium structure that processes instructions from "functional units" to "issue ports, each issue port having execution resources" | This is a substantive change in BIAX's infringement theory. BIAX seeks to accuse a new or different structure by changing its identification of accused structure in the Itanium processor from "functional units" to "issue ports, each issue port having execution resources". | Ward Decl. Ex. M, *Intel® Itanium® 2 Processor Reference Manual for Software Development and Optimization*, at 26-28 (2004) |
| Pg. 6, block 3, lines 4-6 | Insert citation to Itanium Merced and McKinley code. | This citation supports the substantive change to BIAX's infringement theory objected to in the row above. | N/A |
| Pg. 10, block 2, line 1 | Insert a contention covering Itanium's assembler | This is a substantive change to BIAX's infringement theory. BIAX seeks to accuse a new or different | Ward Decl. Ex. N, *Intel™ Itanium™ Architecture* |

| | | Intel's Objections to BIAX's Proposed Changes for '755 Patent, Itanium and Itanium 2 | |
|---|---|---|---|
| **Location of Change in BIAX Ex. D (Part 1 of 3)** | **Nature of Change to Contention** | **Basis For Objection** | **Cite to Public Document (where applicable)** |
| | | structure by adding a contention covering the Itanium assembler in addition to the Itanium compiler. | *Assembly Language Reference Guide*, at 31-33 (2001) |
| Pg. 10, block 2, lines 3-4 | Change the contention from covering Itanium's execution units to covering Itanium's issue ports | This is a substantive change to BIAX's infringement theory. BIAX seeks to accuse a new or different structure by changing the contention from covering the Itanium execution units to covering the Itanium issue ports | Ward Decl. Ex. M, *Intel® Itanium® 2 Processor Reference Manual for Software Development and Optimization*, at 26-28 (2004) |
| Pg. 10, block 2, line 4 | Insert contention that the mapping of instruction slots to issue ports "represents logical processor numbers for the instructions" | This is a substantive change to BIAX's infringement theory. BIAX seeks to accuse a new or different structure by adding an additional contention that the mapping of instruction slots to issue ports "represents logical processor numbers for the instructions", which was missing entirely from the original contention. | Ward Decl. Ex. M, *Intel® Itanium® 2 Processor Reference Manual for Software Development and Optimization*, at 26-28 (2004) |
| Pg. 10, block 2, line 6 | Insert contention that "the added intelligence also includes stop bits, which represent instruction firing times for the instructions" | This is a substantive change to BIAX's infringement theory. BIAX seeks to accuse a new or different structure by adding an additional contention that "the added intelligence also includes stop bits, which represent instruction firing times for the instructions". | Ward Decl. Ex. P, Marsha Eng, et. al, *"Mesocode: Optimizations for Improving Fetch Bandwidth of Itanium Processors"* Workshop on Complexity-Effective Design (WCED), May 2002, at 2. |
| Pg. 12, block 1, lines 10-12 | Insert citation to Itanium assembler code | This citation supports the substantive change to BIAX's infringement theory objected to in the two rows above. | N/A |

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| Intel's Objections to BIAX's Proposed Changes for '755 Patent, Itanium and Itanium 2 | | | |
|---|---|---|---|
| **Location of Change in BIAX Ex. D (Part 1 of 3)** | **Nature of Change to Contention** | **Basis For Objection** | **Cite to Public Document (where applicable)** |
| Pg. 12, block 2, line 3 | Insert a contention covering Itanium's assembler | This is a substantive change to BIAX's infringement theory. BIAX seeks to accuse a new or different structure by adding a contention covering the Itanium assembler in addition to the Itanium compiler. | Ward Decl. Ex. N, *Intel® Itanium™ Architecture Assembly Language Reference Guide*, at 31-33 (2001) |
| Pg. 12, block 3, lines 3-5 | Change citation of "the EXP stage of the pipeline" to "Logic in the IFR (instruction fetch and rotate) unit and ISD(instruction dispersal unit)" | This is a substantive change in BIAX's infringement theory. BIAX seeks to accuse a new or different structure by changing the identified structure from "the EXP stage of the pipeline" to "logic in the IFR…and ISD" | Ward Decl. Ex. Q, *Intel® Itanium® 2 Processor Hardware Developer's Manual*, at 2-4 to 2-5 (2002) |
| Pg 12, block 3, line 7 | Insert "to issue ports" | This is a substantive change in BIAX's infringement theory. BIAX seeks to accuse a new or different structure by adding a contention that the instructions are delivered "to issue ports." | Ward Decl. Ex. M, *Intel® Itanium® 2 Processor Reference Manual for Software Development and Optimization*, at 26-28 (2004) |
| Pg. 12, block 3, lines 8-10 | Insert citation to Itanium Merced and McKinley code | This citation supports the substantive change to BIAX's infringement theory objected to in the row above. | N/A |
| Pg. 14, block 2, lines 1-2 | Change the contention from covering Itanium's "functional units" to covering Itanium's "issue ports and their associated execution resources". | This is a substantive change in BIAX's infringement theory. BIAX seeks to accuse a new or different structure by changing the identified structure from the "functional units" to the "issue ports and their associated execution resources" | Ward Decl. Ex. M, *Intel® Itanium® 2 Processor Reference Manual for Software Development and Optimization*, at 26-28 (2004) |
| Pg 14, block 2, lines 3-11; | Insert citation to Itanium Merced and McKinley code | This citation supports the substantive change to BIAX's infringement theory objected to in the row | N/A |

| | Intel's Objections to BIAX's Proposed Changes for '755 Patent, Itanium and Itanium 2 | | |
|---|---|---|---|
| **Location of Change in BIAX Ex. D (Part 1 of 3)** | **Nature of Change to Contention** | **Basis For Objection** | **Cite to Public Document (where applicable)** |
| Pg. 15, block 1, lines 1-3 | | above. | |
| Pg. 16, block 1, lines 1-6 | Adds contention that the "crossbar connects the" issue ports. | This is a substantive change in BIAX's infringement theory. BIAX seeks to accuse a new or different structure by adding a citation to additional structure in the Itanium processor | Ward Decl. Ex. Q, *Intel® Itanium® 2 Processor Hardware Developer's Manual*, at 2-4 to 2-5 (2002) |
| Pg. 16, block 1, lines 1-6 | Changes identification of the "Instruction Buffer" as the source of instructions to identification of the "ISD unit" as the source. | This is a substantive change in BIAX's infringement theory. BIAX seeks to accuse a new or different structure by changing its identification of accused structure in the Itanium processor. | Ward Decl. Ex. Q, *Intel® Itanium® 2 Processor Hardware Developer's Manual*, at 2-4 to 2-5 (2002) |
| Pg. 16, block 1, lines 1-6 | Changes identification of the Itanium structure that processes instructions from "functional units" to "issue ports, each issue port having execution resources" | This is a substantive change in BIAX's infringement theory. BIAX seeks to accuse a new or different structure by changing its identification of accused structure in the Itanium processor from "functional units" to "issue ports, each issue port having execution resources". | Ward Decl. Ex. M, *Intel® Itanium® 2 Processor Reference Manual for Software Development and Optimization*, at 26-28 (2004) |
| Pg. 16, block 1, lines 7-8 | Insert citation to Itanium Merced and McKinley code. | This citation supports the substantive change to BIAX's infringement theory objected to in the two rows above. | N/A |
| Pg. 19, block 2, line 1 | Insert a contention covering Itanium's assembler | This is a substantive change to BIAX's infringement theory. BIAX seeks to accuse a new or different structure by adding a contention covering the Itanium assembler in addition to the Itanium compiler. | Ward Decl. Ex. N, *Intel™ Itanium™ Architecture Assembly Language Reference Guide*, at 31-33 (2001) |

| Intel's Objections to BIAX's Proposed Changes for '755 Patent, Itanium and Itanium 2 | | |
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| **Location of Change in BIAX Ex. D (Part 1 of 3)** | **Nature of Change to Contention** | **Basis For Objection** | **Cite to Public Document (where applicable)** |
| Pg. 21, block 1, line 11-13 | Insert citation to Itanium assembler code | This citation supports the substantive change to BIAX's infringement theory objected to in the row above. | N/A |
| Pg. 21, block 2, line 3 | Insert a contention covering Itanium's assembler | This is a substantive change to BIAX's infringement theory. BIAX seeks to accuse a new or different structure by adding a contention covering the Itanium assembler in addition to the Itanium compiler. | Ward Decl. Ex. N, *Intel® Itanium™ Architecture Assembly Language Reference Guide*, at 31-33 (2001) |
| Pg. 22, block 2, lines 1-2 | Change the contention from covering Itanium's "functional units" to covering Itanium's "issue ports and their associated execution units". | This is a substantive change in BIAX's infringement theory. BIAX seeks to accuse a new or different structure by changing the identified structure from the "functional units" to the "issue ports and their associated execution units" | Ward Decl. Ex. M, *Intel® Itanium® 2 Processor Reference Manual for Software Development and Optimization*, at 26-28 (2004) |
| Pg. 22, block 2, lines 3-15 | Insert citation to Itanium Merced and McKinley code | This citation supports the substantive change to BIAX's infringement theory objected to in the row above. | N/A |
| Pg. 23, block 2, line 1 | Adds contention that the "crossbar connects the" issue ports. | This is a substantive change in BIAX's infringement theory. BIAX seeks to accuse a new or different structure by adding a citation to additional structure in the Itanium processor | Ward Decl. Ex. Q, *Intel® Itanium® 2 Processor Hardware Developer's Manual*, at 2-4 to 2-5 (2002) |
| Pg. 23, block 2, lines 1-2 | Changes identification of the "Instruction Buffer" as the source of instructions to identification of the "ISD unit" as the source. | This is a substantive change in BIAX's infringement theory. BIAX seeks to accuse a new or different structure by changing its identification of accused structure in the Itanium processor. | Ward Decl. Ex. Q, *Intel® Itanium® 2 Processor Hardware Developer's Manual*, at 2-4 to 2-5 (2002) |

| Intel's Objections to BIAX's Proposed Changes for '755 Patent, Itanium and Itanium 2 | | |
|---|---|---|
| **Location of Change in BIAX Ex. D (Part 1 of 3)** | **Nature of Change to Contention** | **Basis For Objection** | **Cite to Public Document (where applicable)** |
| Pg. 23, block 2, lines 3-4 | Changes identification of the Itanium structure that processes instructions from "functional units" to "issue ports, each issue port having execution resources" | This is a substantive change in BIAX's infringement theory. BIAX seeks to accuse a new or different structure by changing its identification of accused structure in the Itanium processor from "functional units" to "issue ports, each issue port having execution resources". | Ward Decl. Ex. M, *Intel® Itanium® 2 Processor Reference Manual for Software Development and Optimization,* at 26-28 (2004) |
| Pg. 23, block 2, lines 4-6 | Insert citation to Itanium Merced and McKinley code. | This citation supports the substantive change to BIAX's infringement theory objected to in the three rows above. | N/A |
| Pg. 26, block 1, lines 4-5 | Change the contention from covering Itanium's "functional units" to covering Itanium's "issue ports and their associated execution resources". | This is a substantive change in BIAX's infringement theory. BIAX seeks to accuse a new or different structure by changing the identified structure from the "functional units" to the "issue ports and their associated execution resources" | Ward Decl. Ex. M, *Intel® Itanium® 2 Processor Reference Manual for Software Development and Optimization,* at 26-28 (2004) |
| Pg. 26, block 1, lines 8-19 | Insert citation to Itanium Merced and McKinley code | This citation supports the substantive change to BIAX's infringement theory objected to in the row above. | N/A |
| Pg. 28, block 2, line 1 | Insert a contention covering Itanium's assembler | This is a substantive change to BIAX's infringement theory. BIAX seeks to accuse a new or different structure by adding a contention covering the Itanium assembler in addition to the Itanium compiler. | Ward Decl. Ex. N, *Intel® Itanium™ Architecture Assembly Language Reference Guide,* at 31-33 (2001) |
| Pg. 29, block 1, line 28-30 | Insert citation to Itanium assembler code | This citation supports the substantive change to BIAX's infringement theory objected to in the row above. | N/A |

| | Intel's Objections to BIAX's Proposed Changes for '755 Patent, Itanium and Itanium 2 | | |
|---|---|---|---|
| **Location of Change in BIAX Ex. D (Part 1 of 3)** | **Nature of Change to Contention** | **Basis For Objection** | **Cite to Public Document (where applicable)** |
| Pg. 30, block 1, line 1 | Insert a contention covering Itanium's assembler | This is a substantive change to BIAX's infringement theory.  BIAX seeks to accuse a new or different structure by adding a contention covering the Itanium assembler in addition to the Itanium compiler. | Ward Decl. Ex. N, *Intel® Itanium™ Architecture Assembly Language Reference Guide*, at 31-33 (2001) |
| Pg. 30, block 1, lines 11-13 | Insert citation to Itanium assembler code | This citation supports the substantive change to BIAX's infringement theory objected to in the row above. | N/A |
| Pg. 30, block 2, line 1 | Insert a contention covering Itanium's assembler | This is a substantive change to BIAX's infringement theory.  BIAX seeks to accuse a new or different structure by adding a contention covering the Itanium assembler in addition to the Itanium compiler. | Ward Decl. Ex. N, *Intel® Itanium™ Architecture Assembly Language Reference Guide*, at 31-33 (2001) |
| Pg. 30, block 2, lines 11-13 | Insert citation to Itanium assembler code | This citation supports the substantive change to BIAX's infringement theory objected to in the row above. | N/A |
| Pg. 30, block 3, line 1 | Insert a contention covering Itanium's assembler | This is a substantive change to BIAX's infringement theory.  BIAX seeks to accuse a new or different structure by adding a contention covering the Itanium assembler in addition to the Itanium compiler. | Ward Decl. Ex. N, *Intel® Itanium™ Architecture Assembly Language Reference Guide*, at 31-33 (2001) |
| Pg. 31, block 1, line 22-25 | Insert citation to Itanium assembler code | This citation supports the substantive change to BIAX's infringement theory objected to in the row above. | N/A |
| Pg. 32, block | Insert a contention covering | This is a substantive change to BIAX's infringement | Ward Decl. Ex. N, *Intel®* |

| Intel's Objections to BIAX's Proposed Changes for '755 Patent, Itanium and Itanium 2 | | | |
|---|---|---|---|
| **Location of Change in BIAX Ex. D (Part 1 of 3)** | **Nature of Change to Contention** | **Basis For Objection** | **Cite to Public Document (where applicable)** |
| 2, line 1 | Itanium's assembler | theory. BIAX seeks to accuse a new or different structure by adding a contention covering the Itanium assembler in addition to the Itanium compiler. | *Itanium™ Architecture Assembly Language Reference Guide*, at 31-33 (2001) |
| Pg. 32, block 2, line 2 | Change "architectural stops" to "stop bits" | This is a substantive change to BIAX's infringement theory. BIAX seeks to accuse a new or different structure by changing the identified structure from "architectural stops" to "stop bits". | Ward Decl. Ex. P, Marsha Eng, et. al, *"Mesocode: Optimizations for Improving Fetch Bandwidth of Itanium Processors"* Workshop on Complexity-Effective Design (WCED), May 2002, at 2. |
| Pg. 32, block 2, lines 5-6 | Insert citation to Itanium assembler code | This citation supports the substantive change to BIAX's infringement theory objected to in the two rows above. | N/A |
| Pg. 32, block 3, line 1 | Insert a contention covering Itanium's assembler | This is a substantive change to BIAX's infringement theory. BIAX seeks to accuse a new or different structure by adding a contention covering the Itanium assembler in addition to the Itanium compiler. | Ward Decl. Ex. N, *Intel® Itanium™ Architecture Assembly Language Reference Guide*, at 31-33 (2001) |
| Pg. 32, block 3, line 3 | Changes "execution unit type" to "issue port" | This is a substantive change to BIAX's infringement theory. BIAX seeks to accuse a new or different structure by changing the accused structure from the Itanium "execution unit type" to the Itanium "issue port". | Ward Decl. Ex. M, *Intel® Itanium® 2 Processor Reference Manual for Software Development and Optimization*, at 26-28 (2004) |
| Pg. 33, block | Insert citation to Itanium | This citation supports the substantive change to | N/A |

| | Intel's Objections to BIAX's Proposed Changes for '755 Patent, Itanium and Itanium 2 | | |
|---|---|---|---|
| Location of Change in BIAX Ex. D (Part 1 of 3) | Nature of Change to Contention | Basis For Objection | Cite to Public Document (where applicable) |
| 1, lines 2-3 | assembler code | BIAX's infringement theory objected to in the two rows above. | |
| Pg. 33, block 2, line 1 | Insert a contention covering Itanium's assembler | This is a substantive change to BIAX's infringement theory. BIAX seeks to accuse a new or different structure by adding a contention covering the Itanium assembler in addition to the Itanium compiler. | Ward Decl. Ex. N, *Intel® Itanium™ Architecture Assembly Language Reference Guide*, at 31-33 (2001) |
| Pg. 33, block 2, line 3 | Changes "execution unit type" to "issue port" | This is a substantive change to BIAX's infringement theory. BIAX seeks to accuse a new or different structure by changing the accused structure from the Itanium "execution unit type" to the Itanium "issue port". | Ward Decl. Ex. M, *Intel® Itanium® 2 Processor Reference Manual for Software Development and Optimization*, at 26-28 (2004) |
| Pg. 33, block 2, lines 5-6 | Insert citation to Itanium assembler code | This citation supports the substantive change to BIAX's infringement theory objected to in the two rows above. | N/A |
| Pg. 33, block 3, line 1 | Change "functional units" to "execution units associated with the issue ports". | This is a substantive change in BIAX's infringement theory. BIAX seeks to accuse a new or different structure by changing the identified structure from the "functional units" to "execution units associated with the issue ports" | Ward Decl. Ex. M, *Intel® Itanium® 2 Processor Reference Manual for Software Development and Optimization*, at 26-28 (2004) |
| Pg. 34, block 1, lines 1-13 | Insert citation to Itanium Merced and McKinley code | This citation supports the substantive change to BIAX's infringement theory objected to in the row above. | N/A |
| Pg. 35, block 2, line 1 | Change "11 issue ports" to "the ISD (instruction dispersal) unit" | This is a substantive change in BIAX's infringement theory. BIAX seeks to accuse a new or different | Ward Decl. Ex. Q, *Intel® Itanium® 2 Processor Hardware* |

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| Intel's Objections to BIAX's Proposed Changes for '755 Patent, Itanium and Itanium 2 | | | |
|---|---|---|---|
| **Location of Change in BIAX Ex. D (Part 1 of 3)** | **Nature of Change to Contention** | **Basis For Objection** | **Cite to Public Document (where applicable)** |
| | | structure by changing the identified structure for storing instructions from the "11 issue ports" to "the ISD (instruction dispersal) unit" | *Developer's Manual*, at 2-4 to 2-5 (2002) |
| Pg. 35, block 2, lines 3-22 | Insert citation to Itanium Merced and McKinley code. | This citation supports the substantive change to BIAX's infringement theory objected to in the row above. | N/A |
| Pg. 36, block 2, line | Change "functional unit" to "issue port". | This is a substantive change in BIAX's infringement theory.  BIAX seeks to accuse a new or different structure by changing the identified structure from the "functional unit" to the "issue port". | Ward Decl. Ex. M, *Intel® Itanium® 2 Processor Reference Manual for Software Development and Optimization*, at 26-28 (2004) |
| Pg. 36, block 2, lines 2-3 | Insert "by the ISD (instruction dispersal) unit". | This is a substantive change in BIAX's infringement theory.  BIAX seeks to accuse a new or different structure by inserting additional accused structure, the "the ISD (instruction dispersal) unit". | Ward Decl. Ex. Q, *Intel® Itanium® 2 Processor Hardware Developer's Manual*, at 2-4 to 2-5 (2002) |
| Pg. 36, block 2, line 4 | Change "processor element" to "issue port". | This is a substantive change in BIAX's infringement theory.  BIAX seeks to accuse a new or different structure by changing the identified structure from the "processor element" to the "issue port". | Ward Decl. Ex. M, *Intel® Itanium® 2 Processor Reference Manual for Software Development and Optimization*, at 26-28 (2004) |
| Pg. 36, block 2, lines 5-8 | Insert citation to Itanium Merced and McKinley code. | This citation supports the substantive change to BIAX's infringement theory objected to in the three rows above. | N/A |
| Pg. 38, block 2, line 2 | Change the contention from covering Itanium's "functional | This is a substantive change in BIAX's infringement theory.  BIAX seeks to accuse a new or different | Ward Decl. Ex. M, *Intel® Itanium® 2 Processor Reference* |

**Intel's Objections to BIAX's Proposed Changes for '755 Patent, Itanium and Itanium 2**

| Location of Change in BIAX Ex. D (Part 1 of 3) | Nature of Change to Contention | Basis For Objection | Cite to Public Document (where applicable) |
|---|---|---|---|
| | unit" to covering Itanium's "issue port and its associated execution resources". | structure by changing the identified structure from the "functional unit" to the "issue port and its associated execution resources" | *Manual for Software Development and Optimization,* at 26-28 (2004) |
| Pg. 38, block 2, lines 3-16 | Insert citation to Itanium Merced and McKinley code | This citation supports the substantive change to BIAX's infringement theory objected to in the row above. | N/A |
| Pg. 40, block 1, lines 4-5 | Change the contention from covering Itanium's "functional unit" to covering Itanium's "issue ports and their associated execution resources". | This is a substantive change in BIAX's infringement theory. BIAX seeks to accuse a new or different structure by changing the identified structure from the "functional unit" to the "issue ports and their associated execution resources". | Ward Decl. Ex. M, *Intel® Itanium® 2 Processor Reference Manual for Software Development and Optimization,* at 26-28 (2004) |
| Pg. 40, block 1, lines 7-19 | Insert citation to Itanium Merced and McKinley code | This citation supports the substantive change to BIAX's infringement theory objected to in the row above. | N/A |
| Pg. 42, block 2, line 1 | Insert a contention covering Itanium's assembler | This is a substantive change to BIAX's infringement theory. BIAX seeks to accuse a new or different structure by adding a contention covering the Itanium assembler in addition to the Itanium compiler. | Ward Decl. Ex. N, *Intel® Itanium™ Architecture Assembly Language Reference Guide,* at 31-33 (2001) |
| Pg. 43, block 1, line 29-30 | Insert citation to Itanium assembler code | This citation supports the substantive change to BIAX's infringement theory objected to in the row above. | N/A |
| Pg. 44, block 2, line 1 | Insert a contention covering Itanium's assembler | This is a substantive change to BIAX's infringement theory. BIAX seeks to accuse a new or different structure by adding a contention covering the | Ward Decl. Ex. N, *Intel® Itanium™ Architecture Assembly Language Reference* |

**Intel's Objections to BIAX's Proposed Changes for '755 Patent, Itanium and Itanium 2**

| Location of Change in BIAX Ex. D (Part 1 of 3) | Nature of Change to Contention | Basis For Objection | Cite to Public Document (where applicable) |
|---|---|---|---|
| | | Itanium assembler in addition to the Itanium compiler. | *Guide*, at 31-33 (2001) |
| Pg. 44, block 2, line 2 | Change "architectural stops" to "stop bits' | This is a substantive change to BIAX's infringement theory. BIAX seeks to accuse a new or different structure by changing the identified structure from "architectural stops" to "stop bits". | Ward Decl. Ex. P, Marsha Eng, et. al., *"Mesocode: Optimizations for Improving Fetch Bandwidth of Itanium Processors"*, Workshop on Complexity-Effective Design (WCED), May 2002, at 2. |
| Pg. 44, block 2, lines 5-6 | Insert citation to Itanium assembler code | This citation supports the substantive change to BIAX's infringement theory objected to in the two rows above. | N/A |
| Pg. 45, block 2, line 1 | Insert a contention covering Itanium's assembler | This is a substantive change to BIAX's infringement theory. BIAX seeks to accuse a new or different structure by adding a contention covering the Itanium assembler in addition to the Itanium compiler. | Ward Decl. Ex. N, *Intel® Itanium™ Architecture Assembly Language Reference Guide*, at 31-33 (2001) |
| Pg. 45, block 2, line 3 | Changes "execution unit type" to "issue port" | This is a substantive change to BIAX's infringement theory. BIAX seeks to accuse a new or different structure by changing the accused structure from the Itanium "execution unit type" to the Itanium "issue port". | Ward Decl. Ex. M, *Intel® Itanium® 2 Processor Reference Manual for Software Development and Optimization*, at 26-28 (2004) |
| Pg. 45, block 2, lines 5-6 | Insert citation to Itanium assembler code | This citation supports the substantive change to BIAX's infringement theory objected to in the two rows above. | N/A |

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| Intel's Objections to BIAX's Proposed Changes for '755 Patent, Itanium and Itanium 2 | | |
| --- | --- | --- |
| **Location of Change in BIAX Ex. D (Part 1 of 3)** | **Nature of Change to Contention** | **Basis For Objection** | **Cite to Public Document (where applicable)** |
| Pg. 45, block 3, line 1 | Insert a contention covering Itanium's assembler | This is a substantive change to BIAX's infringement theory. BIAX seeks to accuse a new or different structure by adding a contention covering the Itanium assembler in addition to the Itanium compiler. | Ward Decl. Ex. N, *Intel® Itanium™ Architecture Assembly Language Reference Guide*, at 31-33 (2001) |
| Pg. 45, block 3, line 3 | Changes "execution unit type" to "issue port" | This is a substantive change to BIAX's infringement theory. BIAX seeks to accuse a new or different structure by changing the accused structure from the Itanium "execution unit type" to the Itanium "issue port". | Ward Decl. Ex. M, *Intel® Itanium® 2 Processor Reference Manual for Software Development and Optimization*, at 26-28 (2004) |
| Pg. 45, block 3, lines 5-6 | Insert citation to Itanium assembler code | This citation supports the substantive change to BIAX's infringement theory objected to in the two rows above. | N/A |
| Pg. 46, block 2, line 1 | Change "functional units" to "execution resources associated with the issue ports". | This is a substantive change in BIAX's infringement theory. BIAX seeks to accuse a new or different structure by changing the identified structure from the "functional units" to "execution resources associated with the issue ports" | Ward Decl. Ex. M, *Intel® Itanium® 2 Processor Reference Manual for Software Development and Optimization*, at 26-28 (2004) |
| Pg. 46, block 2, lines 3-15 | Insert citation to Itanium Merced and McKinley code | This citation supports the substantive change to BIAX's infringement theory objected to in the row above. | N/A |
| Pg. 47, block 2, line 1 | Change "11 issue ports" to "the ISD (instruction dispersal) unit" | This is a substantive change in BIAX's infringement theory. BIAX seeks to accuse a new or different structure by changing the identified structure for storing instructions from the "11 issue ports" to "the | Ward Decl. Ex. Q, *Intel® Itanium® 2 Processor Hardware Developer's Manual*, at 2-4 to 2-5 (2002) |

**Intel's Objections to BIAX's Proposed Changes for '755 Patent, Itanium and Itanium 2**

| Location of Change in BIAX Ex. D (Part 1 of 3) | Nature of Change to Contention | Basis For Objection | Cite to Public Document (where applicable) |
|---|---|---|---|
| | | ISD (instruction dispersal) unit" | |
| Pg. 47, block 2, lines 3-22 | Insert citation to Itanium Merced and McKinley code | This citation supports the substantive change to BIAX's infringement theory objected to in the row above. | N/A |
| Pg. 48, block 2, line 1 | Change "functional units" to "issue ports". | This is a substantive change in BIAX's infringement theory.  BIAX seeks to accuse a new or different structure by changing the identified structure from the "functional units" to the "issue ports". | Ward Decl. Ex. M, *Intel® Itanium® 2 Processor Reference Manual for Software Development and Optimization,* at 26-28 (2004) |
| Pg. 48, block 2, line 4 | Change "processor element" to "issue port" | This is a substantive change in BIAX's infringement theory.  BIAX seeks to accuse a new or different structure by changing the identified structure from the "processor element" to the "issue port". | Ward Decl. Ex. M, *Intel® Itanium® 2 Processor Reference Manual for Software Development and Optimization,* at 26-28 (2004) |
| Pg. 48, block 2, lines 5-8 | Insert citation to Itanium Merced and McKinley code. | This citation supports the substantive change to BIAX's infringement theory objected to in the two rows above. | N/A |
| Pg. 50, block 2, lines 1-2 | Change the contention from covering Itanium's "processor element" to covering Itanium's "issue port and its associated execution resources". | This is a substantive change in BIAX's infringement theory.  BIAX seeks to accuse a new or different structure by changing the identified structure from the "processor element" to the "issue port and its associated execution resources" | Ward Decl. Ex. M, *Intel® Itanium® 2 Processor Reference Manual for Software Development and Optimization,* at 26-28 (2004) |
| Pg. 50, block 2, lines 3-15 | Insert citation to Itanium Merced and McKinley code | This citation supports the substantive change to BIAX's infringement theory objected to in the row above. | N/A |

| Intel's Objections to BIAX's Proposed Changes for '755 Patent, Itanium and Itanium 2 | | |
|---|---|---|
| **Location of Change in BIAX Ex. D (Part 1 of 3)** | **Nature of Change to Contention** | **Basis For Objection** | **Cite to Public Document (where applicable)** |
| Pg. 54, block 2, line 1 | Insert a contention covering Itanium's assembler | This is a substantive change to BIAX's infringement theory. BIAX seeks to accuse a new or different structure by adding a contention covering the Itanium assembler in addition to the Itanium compiler. | Ward Decl. Ex. N, *Intel® Itanium™ Architecture Assembly Language Reference Guide*, at 31-33 (2001) |
| Pg. 55, block 1, lines 10-12 | Insert citation to Itanium assembler code | This citation supports the substantive change to BIAX's infringement theory objected to in the row above. | N/A |
| Pg. 55, block 2, line 1 | Insert a contention covering Itanium's assembler | This is a substantive change to BIAX's infringement theory. BIAX seeks to accuse a new or different structure by adding a contention covering the Itanium assembler in addition to the Itanium compiler. | Ward Decl. Ex. N, *Intel® Itanium™ Architecture Assembly Language Reference Guide*, at 31-33 (2001) |
| Pg. 55, block 2, lines 10-12 | Insert citation to Itanium assembler code | This citation supports the substantive change to BIAX's infringement theory objected to in the row above. | N/A |
| Pg. 55, block 3, line 1 | Insert a contention covering Itanium's assembler | This is a substantive change to BIAX's infringement theory. BIAX seeks to accuse a new or different structure by adding a contention covering the Itanium assembler in addition to the Itanium compiler. | Ward Decl. Ex. N, *Intel® Itanium™ Architecture Assembly Language Reference Guide*, at 31-33 (2001) |
| Pg. 55, block 3, lines 3-5 | Insert citation to Itanium assembler code | This citation supports the substantive change to BIAX's infringement theory objected to in the row above. | N/A |
| Pg. 57, block | Insert a contention covering | This is a substantive change to BIAX's infringement | Ward Decl. Ex. N, *Intel®* |

| Intel's Objections to BIAX's Proposed Changes for '755 Patent, Itanium and Itanium 2 | | |
| --- | --- | --- |
| **Location of Change in BIAX Ex. D (Part 1 of 3)** | **Nature of Change to Contention** | **Basis For Objection** | **Cite to Public Document (where applicable)** |
| 2, line 1 | Itanium's assembler | theory. BIAX seeks to accuse a new or different structure by adding a contention covering the Itanium assembler in addition to the Itanium compiler. | *Itanium™ Architecture Assembly Language Reference Guide,* at 31-33 (2001) |
| Pg. 57, block 2, lines 5-6 | Insert citation to Itanium assembler code | This citation supports the substantive change to BIAX's infringement theory objected to in the row above. | N/A |
| Pg. 58, block 2, line 1 | Insert a contention covering Itanium's assembler | This is a substantive change to BIAX's infringement theory. BIAX seeks to accuse a new or different structure by adding a contention covering the Itanium assembler in addition to the Itanium compiler. | Ward Decl. Ex. N, *Intel® Itanium™ Architecture Assembly Language Reference Guide,* at 31-33 (2001) |
| Pg. 58, block 2, lines 5-6 | Insert citation to Itanium assembler code | This citation supports the substantive change to BIAX's infringement theory objected to in the row above. | N/A |
| Pg. 58, block 3, line 1 | Insert a contention covering Itanium's assembler | This is a substantive change to BIAX's infringement theory. BIAX seeks to accuse a new or different structure by adding a contention covering the Itanium assembler in addition to the Itanium compiler. | Ward Decl. Ex. N, *Intel® Itanium™ Architecture Assembly Language Reference Guide,* at 31-33 (2001) |
| Pg. 58, block 3, lines 4-5 | Insert citation to Itanium assembler code | This citation supports the substantive change to BIAX's infringement theory objected to in the row above. | N/A |
| Pg. 58, block 4, line 2 | Change "11 issue ports" to "the ISD (instruction dispersal) unit" | This is a substantive change in BIAX's infringement theory. BIAX seeks to accuse a new or different | Ward Decl. Ex. Q, *Intel® Itanium® 2 Processor Hardware* |

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**Intel's Objections to BIAX's Proposed Changes for '755 Patent, Itanium and Itanium 2**

| Location of Change in BIAX Ex. D (Part 1 of 3) | Nature of Change to Contention | Basis For Objection | Cite to Public Document (where applicable) |
|---|---|---|---|
| | | structure by changing the identified structure for storing instructions from the "11 issue ports" to "the ISD (instruction dispersal) unit" | *Developer's Manual*, at 2-4 to 2-5 (2002) |
| Pg. 59, block 1, lines 2-18 | Insert citation to Itanium Merced and McKinley code | This citation supports the substantive change to BIAX's infringement theory objected to in the row above. | N/A |
| Pg. 59, block 2, line 1 | Change "functional units" to "issue ports". | This is a substantive change in BIAX's infringement theory.  BIAX seeks to accuse a new or different structure by changing the identified structure from the "functional units" to the "issue ports". | Ward Decl. Ex. M, *Intel® Itanium® 2 Processor Reference Manual for Software Development and Optimization*, at 26-28 (2004) |
| Pg. 60, block 1, lines 2-5 | Insert citation to Itanium Merced and McKinley code. | This citation supports the substantive change to BIAX's infringement theory objected to in the row above. | N/A |
| Pg. 60, block 2, line 1 | Change "functional unit" to "issue port". | This is a substantive change in BIAX's infringement theory.  BIAX seeks to accuse a new or different structure by changing the identified structure from the "functional unit" to the "issue port". | Ward Decl. Ex. M, *Intel® Itanium® 2 Processor Reference Manual for Software Development and Optimization*, at 26-28 (2004) |
| Pg. 60, block 2, lines 3-6 | Insert citation to Itanium Merced and McKinley code. | This citation supports the substantive change to BIAX's infringement theory objected to in the row above. | N/A |
| Pg. 64, block 2, lines 1-2 | Insert a contention covering Itanium's assembler | This is a substantive change to BIAX's infringement theory.  BIAX seeks to accuse a new or different structure by adding a contention covering the | Ward Decl. Ex. N, *Intel® Itanium™ Architecture Assembly Language Reference* |

**Intel's Objections to BIAX's Proposed Changes for '755 Patent, Itanium and Itanium 2**

| Location of Change in BIAX Ex. D (Part 1 of 3) | Nature of Change to Contention | Basis For Objection | Cite to Public Document (where applicable) |
|---|---|---|---|
| | | Itanium assembler in addition to the Itanium compiler. | *Guide*, at 31-33 (2001) |
| Pg. 66, block 1, lines 11-13 | Insert citation to Itanium assembler code | This citation supports the substantive change to BIAX's infringement theory objected to in the row above. | N/A |
| Pg. 67, block 1, lines 1-2 | Change the contention from covering Itanium's "functional unit" to covering Itanium's "issue port and its associated execution resources". | This is a substantive change in BIAX's infringement theory. BIAX seeks to accuse a new or different structure by changing the identified structure from the "functional unit" to the "issue port and its associated execution resources" | Ward Decl. Ex. M, *Itanium® 2 Processor Reference Manual for Software Development and Optimization*, at 26-28 (2004) |
| Pg. 67, block 1, lines 3-15 | Insert citation to Itanium Merced and McKinley code | This citation supports the substantive change to BIAX's infringement theory objected to in the row above. | N/A |
| Pg. 68, block 2, lines 1-3 | Changes the contention from identifying a "back end (BE)" that connects "the function units" to the "Instruction Buffer (IB)" to identifying a "crossbar" that connects the "plurality of issue ports" with the "ISD unit" | This is three substantive changes in BIAX's infringement theories. BIAX seeks to accuse a new or different structure by changing the accused structure from a "back end (BE)" that connects "the function units" to the "Instruction Buffer (IB)", to a "crossbar" that connects the "plurality of issue ports" with the "ISD unit" | Ward Decl. Ex. Q, *Intel® Itanium® 2 Processor Hardware Developer's Manual*, at 2-4 to 2-5 (2002) |
| Pg. 68, block 2, lines 3-5 | Insert citation to Itanium Merced and McKinley code | This citation supports the substantive change to BIAX's infringement theory objected to in the row above. | N/A |
| Pg. 69, block 2, line 1 | Change "functional units" to "execution resources associated | This is a substantive change in BIAX's infringement theory. BIAX seeks to accuse a new or different | Ward Decl. Ex. M, *Itanium® 2 Processor Reference* |

**Intel's Objections to BIAX's Proposed Changes for '755 Patent, Itanium and Itanium 2**

| Location of Change in BIAX Ex. D (Part 1 of 3) | Nature of Change to Contention | Basis For Objection | Cite to Public Document (where applicable) |
|---|---|---|---|
| | with the issue ports". | structure by changing the identified structure from the "functional units" to "execution resources associated with the issue ports" | *Manual for Software Development and Optimization*, at 26-28 (2004) |
| Pg. 70, block 2, lines 1-2 | Change citation of "The Instruction Buffer (IB)" to "Logic in the IFR (instruction fetch and rotate) unit and ISD(instruction dispersal unit)" | This is a substantive change in BIAX's infringement theory. BIAX seeks to accuse a new or different structure by changing the identified structure from "The Instruction Buffer (IB)" to "logic in the IFR…and ISD" | Ward Decl. Ex. Q, *Intel® Itanium® 2 Processor Hardware Developer's Manual*, at 2-4 to 2-5 (2002) |
| Pg. 70, block 2, line 2 | Change "functional units" to "issue ports". | This is a substantive change in BIAX's infringement theory. BIAX seeks to accuse a new or different structure by changing the identified structure from the "functional units" to "issue ports" | Ward Decl. Ex. M, *Intel® Itanium® 2 Processor Reference Manual for Software Development and Optimization*, at 26-28 (2004) |
| Pg. 70, block 2, lines 5-7 | Insert citation to Itanium Merced and McKinley code | This citation supports the substantive change to BIAX's infringement theory objected to in the two rows above. | N/A |
| Pg. 71, block 2, line 1 | Change the contention from covering Itanium's "functional units" to covering Itanium's "issue ports and their associated execution resources". | This is a substantive change in BIAX's infringement theory. BIAX seeks to accuse a new or different structure by changing the identified structure from the "functional units" to the "issue ports and their associated execution resources" | Ward Decl. Ex. M, *Intel® Itanium® 2 Processor Reference Manual for Software Development and Optimization*, at 26-28 (2004) |
| Pg. 71, block 2, lines 2-3 | Change the contention from covering Itanium's "functional elements" to covering Itanium's "issue ports and their associated | This is a substantive change in BIAX's infringement theory. BIAX seeks to accuse a new or different structure by changing the identified structure from the "functional elements" to the "issue ports and | Ward Decl. Ex. M, *Intel® Itanium® 2 Processor Reference Manual for Software Development and Optimization*, |

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| | Intel's Objections to BIAX's Proposed Changes for '755 Patent, Itanium and Itanium 2 | | |
| --- | --- | --- | --- |
| Location of Change in BIAX Ex. D (Part 1 of 3) | Nature of Change to Contention | Basis For Objection | Cite to Public Document (where applicable) |
| | execution resources". | their associated execution resources" | at 26-28 (2004) |
| Pg. 74, block 1, line 1 | Change the contention from covering Itanium's "functional elements" to covering Itanium's "issue ports and their associated execution resources". | This is a substantive change in BIAX's infringement theory. BIAX seeks to accuse a new or different structure by changing the identified structure from the "functional elements" to the "issue ports and their associated execution resources" | Ward Decl. Ex. M, *Intel® Itanium® 2 Processor Reference Manual for Software Development and Optimization*, at 26-28 (2004) |

**Intel's Objections to BIAX's Proposed Changes for '945 Patent, Itanium and Itanium 2**

| Location of Change in BIAX Ex. D (Part 2 of 3) | Nature of Change to Contention | Basis For Objection | Cite to Public Document (where applicable) |
|---|---|---|---|
| Pg. 2, block 2, line 1 | Insert a contention covering Itanium's assembler | This is a substantive change to BIAX's infringement theory. BIAX seeks to accuse a new or different structure by adding a contention covering the Itanium assembler in addition to the Itanium compiler. | Ward Decl. Ex. N, *Intel® Itanium™ Architecture Assembly Language Reference Guide*, at 31-33 (2001) |
| Pg. 3, block 1, line 30; Pg. 4, block 1, line 1 | Insert citation to Itanium assembler code | This citation supports the substantive change to BIAX's infringement theory objected to in the row above. | N/A |
| Pg. 4, block 2, line 1 | Insert a contention covering Itanium's assembler | This is a substantive change to BIAX's infringement theory. BIAX seeks to accuse a new or different structure by adding a contention covering the Itanium assembler in addition to the Itanium compiler. | Ward Decl. Ex. N, *Intel® Itanium™ Architecture Assembly Language Reference Guide*, at 31-33 (2001) |
| Pg. 4, block 2, lines 11-14 | Insert citation to Itanium assembler code | This citation supports the substantive change to BIAX's infringement theory objected to in the row above. | N/A |
| Pg. 4, block 3, line 1 | Insert a contention covering Itanium's assembler | This is a substantive change to BIAX's infringement theory. BIAX seeks to accuse a new or different structure by adding a contention covering the Itanium assembler in addition to the Itanium compiler. | Ward Decl. Ex. N, *Intel® Itanium™ Architecture Assembly Language Reference Guide*, at 31-33 (2001) |
| Pg. 4, block 3, lines 11-14 | Insert citation to Itanium assembler code | This citation supports the substantive change to BIAX's infringement theory objected to in the row above. | N/A |

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**Intel's Objections to BIAX's Proposed Changes for '945 Patent, Itanium and Itanium 2**

| Location of Change in BIAX Ex. D (Part 2 of 3) | Nature of Change to Contention | Basis For Objection | Cite to Public Document (where applicable) |
|---|---|---|---|
| Pg. 4, block 4, line 1 | Insert a contention covering Itanium's assembler | This is a substantive change to BIAX's infringement theory. BIAX seeks to accuse a new or different structure by adding a contention covering the Itanium assembler in addition to the Itanium compiler. | Ward Decl. Ex. N, *Intel® Itanium™ Architecture Assembly Language Reference Guide*, at 31-33 (2001) |
| Pg. 6, block 2, line 1 | Insert a contention covering Itanium's assembler | This is a substantive change to BIAX's infringement theory. BIAX seeks to accuse a new or different structure by adding a contention covering the Itanium assembler in addition to the Itanium compiler. | Ward Decl. Ex. N, *Intel® Itanium™ Architecture Assembly Language Reference Guide*, at 31-33 (2001) |
| Pg. 6, block 2, line 1 | Insert an additional contention that instruction firing times correspond to "stop bits". | This is a substantive change to BIAX's infringement theory. BIAX seeks to accuse a new or different structure by adding a contention that instruction firing times correspond to "stop bits". | Ward Decl. Ex. P, Marsha Eng, et. al. *"Mesocode: Optimizations for Improving Fetch Bandwidth of Itanium Processors"*, Workshop on Complexity-Effective Design (WCED), May 2002, at 2. |
| Pg. 6. block 2, lines 5-6 | Insert citation to Itanium assembler code | This citation supports the substantive change to BIAX's infringement theory objected to in the two rows above. | N/A |
| Pg. 7, block 2, line 1 | Insert a contention covering Itanium's assembler | This is a substantive change to BIAX's infringement theory. BIAX seeks to accuse a new or different structure by adding a contention covering the Itanium assembler in addition to the Itanium compiler. | Ward Decl. Ex. N, *Intel® Itanium™ Architecture Assembly Language Reference Guide*, at 31-33 (2001) |

**Intel's Objections to BIAX's Proposed Changes for '945 Patent, Itanium and Itanium 2**

| Location of Change in BIAX Ex. D (Part 2 of 3) | Nature of Change to Contention | Basis For Objection | Cite to Public Document (where applicable) |
|---|---|---|---|
| Pg. 7, block 2, line 3 | Changes "execution unit type" to "issue port" | This is a substantive change to BIAX's infringement theory. BIAX seeks to accuse a new or different structure by changing the accused structure from the Itanium "execution unit type" to the Itanium "issue port". | Ward Decl. Ex. M, Intel® Itanium® 2 Processor Reference Manual for Software Development and Optimization, at 26-28 (2004) |
| Pg. 7, block 2, lines 5-6 | Insert citation to Itanium assembler code | This citation supports the substantive change to BIAX's infringement theory objected to in the two rows above. | N/A |
| Pg. 7, block 3, line 1 | Insert a contention covering Itanium's assembler | This is a substantive change to BIAX's infringement theory. BIAX seeks to accuse a new or different structure by adding a contention covering the Itanium assembler in addition to the Itanium compiler. | Ward Decl. Ex. N, Intel® Itanium™ Architecture Assembly Language Reference Guide, at 31-33 (2001) |
| Pg. 7, block 3, lines 4-5 | Insert citation to Itanium assembler code | This citation supports the substantive change to BIAX's infringement theory objected to in the two rows above. | N/A |
| Pg. 7, block 5, line 1 | Change the contention from covering Itanium's "functional unit" to covering Itanium's "issue ports and their associated execution resources". | This is a substantive change in BIAX's infringement theory. BIAX seeks to accuse a new or different structure by changing the identified structure from the "functional unit" to the "issue ports and their associated execution resources" | Ward Decl. Ex. M, Intel® Itanium® 2 Processor Reference Manual for Software Development and Optimization, at 26-28 (2004) |
| Pg. 8, block 1, lines 1-13 | Insert citation to Itanium Merced and McKinley code | This citation supports the substantive change to BIAX's infringement theory objected to in the row above. | N/A |
| Pg. 10, block | Insert a contention covering | This is a substantive change to BIAX's | Ward Decl. Ex. N, Intel® |

Intel's Objections to BIAX's Proposed Changes for '945 Patent, Itanium and Itanium 2

| Location of Change in BIAX Ex. D (Part 2 of 3) | Nature of Change to Contention | Basis For Objection | Cite to Public Document (where applicable) |
|---|---|---|---|
| Pg. 10, line 1 | Itanium's assembler | infringement theory.  BIAX seeks to accuse a new or different structure by adding a contention covering the Itanium assembler in addition to the Itanium compiler. | *Itanium™ Architecture Assembly Language Reference Guide*, at 31-33 (2001) |
| Pg. 10, block 1, line 15 | Insert citation to Itanium assembler code | This citation supports the substantive change to BIAX's infringement theory objected to in the two rows above. | N/A |
| Pg. 11, block 1, lines 4-5 | Change the contention from covering Itanium's "functional unit" to covering Itanium's "issue port and its associated execution resources". | This is a substantive change in BIAX's infringement theory.  BIAX seeks to accuse a new or different structure by changing the identified structure from the "functional unit" to the "issue port and its associated execution resources" | Ward Decl. Ex. M, *Intel® Itanium® 2 Processor Reference Manual for Software Development and Optimization*, at 26-28 (2004) |
| Pg. 11, block 1, lines 6-18 | Insert citation to Itanium Merced and McKinley code | This citation supports the substantive change to BIAX's infringement theory objected to in the row above. | N/A |
| Pg. 12, block 2, line 1 | Insert a contention covering Itanium's assembler | This is a substantive change to BIAX's infringement theory.  BIAX seeks to accuse a new or different structure by adding a contention covering the Itanium assembler in addition to the Itanium compiler. | Ward Decl. Ex. N, *Intel® Itanium™ Architecture Assembly Language Reference Guide*, at 31-33 (2001) |
| Pg. 14, block 1, line 13-15 | Insert citation to Itanium assembler code | This citation supports the substantive change to BIAX's infringement theory objected to in the row above. | N/A |
| Pg. 14, block 2, line 1 | Insert a contention covering Itanium's assembler | This is a substantive change to BIAX's infringement theory.  BIAX seeks to accuse a new | Ward Decl. Ex. N, *Intel® Itanium™ Architecture* |

| Intel's Objections to BIAX's Proposed Changes for '945 Patent, Itanium and Itanium 2 | | |
|---|---|---|
| **Location of Change in BIAX Ex. D (Part 2 of 3)** | **Nature of Change to Contention** | **Basis For Objection** | **Cite to Public Document (where applicable)** |
| | | or different structure by adding a contention covering the Itanium assembler in addition to the Itanium compiler. | *Assembly Language Reference Guide*, at 31-33 (2001) |
| Pg. 14, block 2, lines 11-14 | Insert citation to Itanium assembler code | This citation supports the substantive change to BIAX's infringement theory objected to in the row above. | N/A |
| Pg. 15, block 1, lines 9-11 | Insert citation to Itanium assembler code | This is a substantive change to BIAX's infringement theory.  BIAX seeks to accuse a new or different structure by adding a contention covering the Itanium assembler in addition to the Itanium compiler. | Ward Decl. Ex. N, *Intel® Itanium™ Architecture Assembly Language Reference Guide*, at 31-33 (2001) |
| Pg. 15, block 2, line 1 | Insert a contention covering Itanium's assembler | This is a substantive change to BIAX's infringement theory.  BIAX seeks to accuse a new or different structure by adding a contention covering the Itanium assembler in addition to the Itanium compiler. | Ward Decl. Ex. N, *Intel® Itanium™ Architecture Assembly Language Reference Guide*, at 31-33 (2001) |
| Pg. 15, block 3, line 1 | Insert a contention covering Itanium's assembler | This is a substantive change to BIAX's infringement theory.  BIAX seeks to accuse a new or different structure by adding a contention covering the Itanium assembler in addition to the Itanium compiler. | Ward Decl. Ex. N, *Intel® Itanium™ Architecture Assembly Language Reference Guide*, at 31-33 (2001) |
| Pg. 16, block 3, line 1 | Insert an additional contention that instruction firing times correspond to "stop bits". | This is a substantive change to BIAX's infringement theory.  BIAX seeks to accuse a new or different structure by adding a contention that instruction firing times correspond to "stop bits". | Ward Decl. Ex. P, Marsha Eng, et. al., *"Mesocode: Optimizations for Improving Fetch Bandwidth of Itanium Processors"*, |

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| Intel's Objections to BIAX's Proposed Changes for '945 Patent, Itanium and Itanium 2 | | | |
| --- | --- | --- | --- |
| Location of Change in BIAX Ex. D (Part 2 of 3) | Nature of Change to Contention | Basis For Objection | Cite to Public Document (where applicable) |
| | | | Workshop on Complexity-Effective Design (WCED), May 2002, at 2. |
| Pg. 16, block 3, line 6 | Insert citation to Itanium assembler code | This citation supports the substantive change to BIAX's infringement theory objected to in the two rows above. | N/A |
| Pg. 17, block 2, line 1 | Insert a contention covering Itanium's assembler | This is a substantive change to BIAX's infringement theory. BIAX seeks to accuse a new or different structure by adding a contention covering the Itanium assembler in addition to the Itanium compiler. | Ward Decl. Ex. N, Intel® Itanium™ Architecture Assembly Language Reference Guide, at 31-33 (2001) |
| Pg .17, block 2, line 6 | Insert citation to Itanium assembler code | This citation supports the substantive change to BIAX's infringement theory objected to in the row above. | N/A |
| Pg. 17, block 3, line 1 | Insert a contention covering Itanium's assembler | This is a substantive change to BIAX's infringement theory. BIAX seeks to accuse a new or different structure by adding a contention covering the Itanium assembler in addition to the Itanium compiler. | Ward Decl. Ex. N, Intel® Itanium™ Architecture Assembly Language Reference Guide, at 31-33 (2001) |
| Pg. 17, block 3, line 6 | Insert citation to Itanium assembler code | This citation supports the substantive change to BIAX's infringement theory objected to in the row above. | N/A |
| Pg. 18, block 1, line 1 | Insert a contention covering Itanium's assembler | This is a substantive change to BIAX's infringement theory. BIAX seeks to accuse a new or different structure by adding a contention | Ward Decl. Ex. N, Intel® Itanium™ Architecture Assembly Language Reference |

| Intel's Objections to BIAX's Proposed Changes for '945 Patent, Itanium and Itanium 2 | | | |
| --- | --- | --- | --- |
| Location of Change in BIAX Ex. D (Part 2 of 3) | Nature of Change to Contention | Basis For Objection | Cite to Public Document (where applicable) |
| | | covering the Itanium assembler in addition to the Itanium compiler. | *Guide*, at 31-33 (2001) |
| Pg. 18, block 1, line 1 | Insert a contention covering Itanium's assembler | This is a substantive change to BIAX's infringement theory. BIAX seeks to accuse a new or different structure by adding a contention covering the Itanium assembler in addition to the Itanium compiler. | Ward Decl. Ex. N, *Intel® Itanium™ Architecture Assembly Language Reference Guide*, at 31-33 (2001) |
| Pg. 18, block 1, line 15 | Insert citation to Itanium assembler code | This citation supports the substantive change to BIAX's infringement theory objected to in the row above. | N/A |
| Pg. 21, block 2, line 1 | Insert a contention covering Itanium's assembler | This is a substantive change to BIAX's infringement theory. BIAX seeks to accuse a new or different structure by adding a contention covering the Itanium assembler in addition to the Itanium compiler. | Ward Decl. Ex. N, *Intel® Itanium™ Architecture Assembly Language Reference Guide*, at 31-33 (2001) |
| Pg. 21, block 2, lines 18-19 | Insert citation to Itanium assembler code | This citation supports the substantive change to BIAX's infringement theory objected to in the row above. | N/A |
| Pg. 21, block 3, line 1 | Insert a contention covering Itanium's assembler | This is a substantive change to BIAX's infringement theory. BIAX seeks to accuse a new or different structure by adding a contention covering the Itanium assembler in addition to the Itanium compiler. | Ward Decl. Ex. N, *Intel® Itanium™ Architecture Assembly Language Reference Guide*, at 31-33 (2001) |
| Pg. 22, block 1, line 1 | Changes "execution unit types" to "issue ports" | This is a substantive change to BIAX's infringement theory. BIAX seeks to accuse a new | Ward Decl. Ex. M, *Intel® Itanium® 2 Processor Reference* |

**Intel's Objections to BIAX's Proposed Changes for '945 Patent, Itanium and Itanium 2**

| Location of Change in BIAX Ex. D (Part 2 of 3) | Nature of Change to Contention | Basis For Objection | Cite to Public Document (where applicable) |
|---|---|---|---|
| | | or different structure by changing the accused structure from the Itanium "execution unit types" to the Itanium "issue ports". | *Manual for Software Development and Optimization,* at 26-28 (2004) |
| Pg. 22, block 1, line 1 | Change "architectural stops" to "stop bits" | This is a substantive change to BIAX's infringement theory. BIAX seeks to accuse a new or different structure by changing the identified structure from "architectural stops" to "stop bits". | Ward Decl. Ex. P, Marsha Eng, et. al, *"Mesocode: Optimizations for Improving Fetch Bandwidth of Itanium Processors",* Workshop on Complexity-Effective Design (WCED), May 2002, at 2. |
| Pg. 22, block 1, lines 4-5 | Insert citation to Itanium assembler code | This citation supports the substantive change to BIAX's infringement theory objected to in the two rows above. | N/A |
| Pg. 23, block 2, lines 1-2 | Change "functional units" to "execution resources associated with the issue ports". | This is a substantive change in BIAX's infringement theory. BIAX seeks to accuse a new or different structure by changing the identified structure from the "functional units" to "execution resources associated with the issue ports" | Ward Decl. Ex. M, *Intel® Itanium® 2 Processor Reference Manual for Software Development and Optimization,* at 26-28 (2004) |
| Pg. 23, block 2, line 3 | Change "functional units" to "issue ports". | This is a substantive change in BIAX's infringement theory. BIAX seeks to accuse a new or different structure by changing the identified structure from the "functional units" to "issue ports" | Ward Decl. Ex. M, *Intel® Itanium® 2 Processor Reference Manual for Software Development and Optimization,* at 26-28 (2004) |
| Pg. 23, block 2, line 3 | Change "processor" to "port". | This is a substantive change in BIAX's infringement theory. BIAX seeks to accuse a new | Ward Decl. Ex. M, *Intel® Itanium® 2 Processor Reference* |

**Intel's Objections to BIAX's Proposed Changes for '945 Patent, Itanium and Itanium 2**

| Location of Change in BIAX Ex. D (Part 2 of 3) | Nature of Change to Contention | Basis For Objection | Cite to Public Document (where applicable) |
|---|---|---|---|
| | | or different structure by changing the identified structure from the "processor" to the "port" | *Manual for Software Development and Optimization*, at 26-28 (2004) |
| Pg. 24, block 1, lines 1-3 | Insert citation to Itanium Merced and McKinley code | This citation supports the substantive change to BIAX's infringement theory objected to in the three rows above. | N/A |
| Pg. 26, block 2, line 1 | Insert a contention covering Itanium's assembler | This is a substantive change to BIAX's infringement theory. BIAX seeks to accuse a new or different structure by adding a contention covering the Itanium assembler in addition to the Itanium compiler. | Ward Decl. Ex. N, *Intel® Itanium™ Architecture Assembly Language Reference Guide*, at 31-33 (2001) |
| Pg. 26, block 2, line 11-13 | Insert citation to Itanium assembler code | This citation supports the substantive change to BIAX's infringement theory objected to in the row above. | N/A |
| Pg. 26, block 3, line 1 | Insert a contention covering Itanium's assembler | This is a substantive change to BIAX's infringement theory. BIAX seeks to accuse a new or different structure by adding a contention covering the Itanium assembler in addition to the Itanium compiler. | Ward Decl. Ex. N, *Intel® Itanium™ Architecture Assembly Language Reference Guide*, at 31-33 (2001) |
| Pg. 26, block 3, line 10; pg. 27, block 1, lines 1-3 | Insert citation to Itanium assembler code | This citation supports the substantive change to BIAX's infringement theory objected to in the row above. | N/A |
| Pg. 27, block 2, line 1 | Insert a contention covering Itanium's assembler | This is a substantive change to BIAX's infringement theory. BIAX seeks to accuse a new | Ward Decl. Ex. N, *Intel® Itanium™ Architecture* |

| Intel's Objections to BIAX's Proposed Changes for '945 Patent, Itanium and Itanium 2 | | | |
|---|---|---|---|
| **Location of Change in BIAX Ex. D (Part 2 of 3)** | **Nature of Change to Contention** | **Basis For Objection** | **Cite to Public Document (where applicable)** |
| | | or different structure by adding a contention covering the Itanium assembler in addition to the Itanium compiler. | *Assembly Language Reference Guide*, at 31-33 (2001) |
| Pg. 28, block 2, lines 2-5 | Add contention that instruction firing times are determined "by the Itanium compiler". | This is a substantive change in BIAX's infringement theory. BIAX seeks to accuse a new or different structure by adding a contention that instruction firing times are added "by the Itanium compiler". | N/A |
| Pg. 28, block 3, line 1 | Insert an additional contention that instruction firing times correspond to "stop bits". | This is a substantive change to BIAX's infringement theory. BIAX seeks to accuse a new or different structure by adding a contention that instruction firing times correspond to "stop bits". | Ward Decl. Ex. P, Marsha Eng, et. al, *"Mesocode: Optimizations for Improving Fetch Bandwidth of Itanium Processors"*, Workshop on Complexity-Effective Design (WCED), May 2002, at 2. |
| Pg. 28, block 3, line 2 | Add contention that instruction firing times are added "by the Itanium compiler or assembler". | This is a substantive change in BIAX's infringement theory. BIAX seeks to accuse a new or different structure by adding a contention that instruction firing times are added "by the Itanium compiler or assembler". | Ward Decl. Ex. N, *Intel® Itanium™ Architecture Assembly Language Reference Guide*, at 31-33 (2001) |
| Pg. 28, block 3, lines 3-4 | Insert citation to Itanium compiler code | This citation supports the substantive change to BIAX's infringement theory objected to in the row above. | N/A |
| Pg. 28, block 3, lines 4-5 | Insert citation to Itanium assembler code | This citation supports the substantive change to BIAX's infringement theory objected to in the | N/A |

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| Intel's Objections to BIAX's Proposed Changes for '945 Patent, Itanium and Itanium 2 | | |
|---|---|---|
| **Location of Change in BIAX Ex. D (Part 2 of 3)** | **Nature of Change to Contention** | **Basis For Objection** | **Cite to Public Document (where applicable)** |
| | | second row above. | |
| Pg. 30, block 1, lines 11-12 | Insert citation to Itanium assembler code | This is a substantive change to BIAX's infringement theory. BIAX seeks to accuse a new or different structure by adding a contention covering the Itanium assembler in addition to the Itanium compiler. | Ward Decl. Ex. N, *Intel® Itanium™ Architecture Assembly Language Reference Guide*, at 31-33 (2001) |
| Pg. 31, block 3, line 1 | Insert an additional contention that instruction firing times correspond to "stop bits". | This is a substantive change to BIAX's infringement theory. BIAX seeks to accuse a new or different structure by adding a contention that instruction firing times correspond to "stop bits". | Ward Decl. Ex. P, Marsha Eng, et. al., *"Mesocode: Optimizations for Improving Fetch Bandwidth of Itanium Processors"*, Workshop on Complexity-Effective Design (WCED), May 2002, at 2. |
| Pg. 31, block 3, lines 4-5 | Insert citation to Itanium assembler code | This is a substantive change to BIAX's infringement theory. BIAX seeks to accuse a new or different structure by adding a contention covering the Itanium assembler in addition to the Itanium compiler. | Ward Decl. Ex. N, *Intel® Itanium™ Architecture Assembly Language Reference Guide*, at 31-33 (2001) |
| Pg. 33, block 2, line 1 | Insert a contention covering Itanium's assembler | This is a substantive change to BIAX's infringement theory. BIAX seeks to accuse a new or different structure by adding a contention covering the Itanium assembler in addition to the Itanium compiler. | Ward Decl. Ex. N, *Intel® Itanium™ Architecture Assembly Language Reference Guide*, at 31-33 (2001) |
| Pg. 33, block 2, line 3 | Changes "execution unit types" to "issue ports" | This is a substantive change to BIAX's infringement theory. BIAX seeks to accuse a new | Ward Decl. Ex. M, *Intel® Itanium® 2 Processor Reference* |

## Intel's Objections to BIAX's Proposed Changes for '945 Patent, Itanium and Itanium 2

| Location of Change in BIAX Ex. D (Part 2 of 3) | Nature of Change to Contention | Basis For Objection | Cite to Public Document (where applicable) |
|---|---|---|---|
| | | or different structure by changing the accused structure from the Itanium "execution unit types" to the Itanium "issue ports". | *Manual for Software Development and Optimization,* at 26-28 (2004) |
| Pg. 33, block 2, lines 5-6 | Insert citation to Itanium assembler code | This citation supports the substantive change to BIAX's infringement theory objected to in the two rows above. | N/A |
| Pg. 33, block 3, line 1 | Insert a contention covering Itanium's assembler | This is a substantive change to BIAX's infringement theory. BIAX seeks to accuse a new or different structure by adding a contention covering the Itanium assembler in addition to the Itanium compiler. | Ward Decl. Ex. N, *Intel® Itanium™ Architecture Assembly Language Reference Guide,* at 31-33 (2001) |
| Pg. 33, block 3, lines 4-5 | Insert citation to Itanium assembler code | This citation supports the substantive change to BIAX's infringement theory objected to in the row above. | N/A |
| Pg. 34, block 2, line 1 | Change "11 issue ports" to "the ISD (instruction dispersal) unit" | This is a substantive change in BIAX's infringement theory. BIAX seeks to accuse a new or different structure by changing the identified structure for storing instructions from the "11 issue ports" to "the ISD (instruction dispersal) unit" | Ward Decl. Ex. Q, *Intel® Itanium® 2 Processor Hardware Developer's Manual,* at 2-4 to 2-5 (2002) |
| Pg. 34, block 2, lines 4-20 | Insert citation to Itanium Merced and McKinley code | This citation supports the substantive change to BIAX's infringement theory objected to in the row above. | N/A |
| Pg. 35, block 2, line 1 | Change "functional units" to "issue ports". | This is a substantive change in BIAX's infringement theory. BIAX seeks to accuse a new or different structure by changing the identified | Ward Decl. Ex. M, *Intel® Itanium® 2 Processor Reference Manual for Software* |

**Intel's Objections to BIAX's Proposed Changes for '945 Patent, Itanium and Itanium 2**

| Location of Change in BIAX Ex. D (Part 2 of 3) | Nature of Change to Contention | Basis For Objection | Cite to Public Document (where applicable) |
|---|---|---|---|
| | | structure from the "functional units" to the "issue ports". | *Development and Optimization,* at 26-28 (2004) |
| Pg. 35, block 2, lines 3-5 | Insert citation to Itanium Merced and McKinley code | This citation supports the substantive change to BIAX's infringement theory objected to in the row above. | N/A |
| Pg. 35, block 3, line 1 | Change the contention from covering Itanium's "functional unit" to covering Itanium's "issue port and its associated execution resources". | This is a substantive change in BIAX's infringement theory. BIAX seeks to accuse a new or different structure by changing the identified structure from the "functional unit" to the "issue port and its associated execution resources" | Ward Decl. Ex. M, *Intel® Itanium® 2 Processor Reference Manual for Software Development and Optimization,* at 26-28 (2004) |
| Pg. 35, block 3, lines 4-6; pg. 36, block 1, line 1 | Insert citation to Itanium Merced and McKinley code | This citation supports the substantive change to BIAX's infringement theory objected to in the row above. | N/A |
| Pg. 41, block 2, line 1 | Insert a contention covering Itanium's assembler | This is a substantive change to BIAX's infringement theory. BIAX seeks to accuse a new or different structure by adding a contention covering the Itanium assembler in addition to the Itanium compiler. | Ward Decl. Ex. N, *Intel® Itanium™ Architecture Assembly Language Reference Guide,* at 31-33 (2001) |
| Pg. 41, block 2, line 18-19 | Insert citation to Itanium assembler code | This citation supports the substantive change to BIAX's infringement theory objected to in the row above. | N/A |
| Pg. 41, block 3, line 1 | Insert a contention covering Itanium's assembler | This is a substantive change to BIAX's infringement theory. BIAX seeks to accuse a new or different structure by adding a contention | Ward Decl. Ex. N, *Intel® Itanium™ Architecture Assembly Language Reference* |

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| | Intel's Objections to BIAX's Proposed Changes for '945 Patent, Itanium and Itanium 2 | | |
| --- | --- | --- | --- |
| Location of Change in BIAX Ex. D (Part 2 of 3) | Nature of Change to Contention | Basis For Objection | Cite to Public Document (where applicable) |
| | | covering the Itanium assembler in addition to the Itanium compiler. | *Guide,* at 31-33 (2001) |
| Pg. 42, block 1, line 2 | Changes "execution unit types" to "issue ports" | This is a substantive change to BIAX's infringement theory. BIAX seeks to accuse a new or different structure by changing the accused structure from the Itanium "execution unit types" to the Itanium "issue ports". | Ward Decl. Ex. M, *Intel® Itanium® 2 Processor Reference Manual for Software Development and Optimization,* at 26-28 (2004) |
| Pg. 42, block 1, line 2 | Change "architectural stops" to "stop bits" | This is a substantive change to BIAX's infringement theory. BIAX seeks to accuse a new or different structure by changing the identified structure from "architectural stops" to "stop bits". | Ward Decl. Ex. P, Marsha Eng, et. al, *"Mesocode: Optimizations for Improving Fetch Bandwidth of Itanium Processors",* Workshop on Complexity-Effective Design (WCED), May 2002, at 2. |
| Pg. 42, block 1, line 5-6 | Insert citation to Itanium assembler code | This citation supports the substantive change to BIAX's infringement theory objected to in the three rows above. | N/A |
| Pg. 43, block 1, line 28 | Insert citation to Itanium assembler code | This citation supports the substantive change to BIAX's infringement theory objected to in the three rows above. | N/A |
| Pg. 43, block 2, lines 1-2 | Change "functional units" to "execution resources associated with the issue ports". | This is a substantive change in BIAX's infringement theory. BIAX seeks to accuse a new or different structure by changing the identified structure from the "functional units" to "execution resources associated with the issue ports" | Ward Decl. Ex. M, *Intel® Itanium® 2 Processor Reference Manual for Software Development and Optimization,* at 26-28 (2004) |

**Intel's Objections to BIAX's Proposed Changes for '945 Patent, Itanium and Itanium 2**

| Location of Change in BIAX Ex. D (Part 2 of 3) | Nature of Change to Contention | Basis For Objection | Cite to Public Document (where applicable) |
|---|---|---|---|
| Pg. 44, block 1, line 1 | Change "functional units" to "issue ports". | This is a substantive change in BIAX's infringement theory. BIAX seeks to accuse a new or different structure by changing the identified structure from the "functional units" to "issue ports" | Ward Decl. Ex. M, *Intel® Itanium® 2 Processor Reference Manual for Software Development and Optimization*, at 26-28 (2004) |
| Pg. 44, block 1, lines 4-20 | Insert citation to Itanium Merced and McKinley code | This citation supports the substantive change to BIAX's infringement theory objected to in the two rows above. | N/A |
| Pg. 47, block 2, line 1 | Insert a contention covering Itanium's assembler | This is a substantive change to BIAX's infringement theory. BIAX seeks to accuse a new or different structure by adding a contention covering the Itanium assembler in addition to the Itanium compiler. | Ward Decl. Ex. N, *Intel® Itanium™ Architecture Assembly Language Reference Guide*, at 31-33 (2001) |
| Pg. 47, block 2, lines 11-13 | Insert citation to Itanium assembler code | This citation supports the substantive change to BIAX's infringement theory objected to in the row above. | N/A |
| Pg. 48, block 1, line 2 | Insert citation to Itanium assembler code | This is a substantive change to BIAX's infringement theory. BIAX seeks to accuse a new or different structure by adding a contention covering the Itanium assembler in addition to the Itanium compiler. | Ward Decl. Ex. N, *Intel® Itanium™ Architecture Assembly Language Reference Guide*, at 31-33 (2001) |
| Pg. 48, block 2, line 1 | Insert a contention covering Itanium's assembler | This is a substantive change to BIAX's infringement theory. BIAX seeks to accuse a new or different structure by adding a contention covering the Itanium assembler in addition to the | Ward Decl. Ex. N, *Intel® Itanium™ Architecture Assembly Language Reference Guide*, at 31-33 (2001) |

**Intel's Objections to BIAX's Proposed Changes for '945 Patent, Itanium and Itanium 2**

| Location of Change in BIAX Ex. D (Part 2 of 3) | Nature of Change to Contention | Basis For Objection | Cite to Public Document (where applicable) |
|---|---|---|---|
| Pg. 49, block 2, line 2 | Add contention that instruction firing times are determined "by the Itanium compiler or assembler". | This is a substantive change in BIAX's infringement theory. BIAX seeks to accuse a new or different structure by adding a contention that instruction firing times are determined "by the Itanium compiler or assembler". | Ward Decl. Ex. N, *Intel® Itanium™ Architecture Assembly Language Reference Guide*, at 31-33 (2001) |
| Pg. 49, block 3, line 1 | Insert an additional contention that instruction firing times correspond to "stop bits". | This is a substantive change to BIAX's infringement theory. BIAX seeks to accuse a new or different structure by adding a contention that instruction firing times correspond to "stop bits". | Ward Decl. Ex. P, Marsha Eng, et. al, *"Mesocode: Optimizations for Improving Fetch Bandwidth of Itanium Processors"*, Workshop on Complexity-Effective Design (WCED), May 2002, at 2. |
| Pg. 52, block 2, lines 4-5 | Insert citation to Itanium assembler code | This citation supports the substantive change to BIAX's infringement theory objected to in the two rows above. | N/A |
| Pg. 52, block 3, line 1 | Insert an additional contention that instruction firing times correspond to "stop bits". | This is a substantive change to BIAX's infringement theory. BIAX seeks to accuse a new or different structure by adding a contention that instruction firing times correspond to "stop bits". | Ward Decl. Ex. P, Marsha Eng, et. al, *"Mesocode: Optimizations for Improving Fetch Bandwidth of Itanium Processors"*, Workshop on Complexity-Effective Design (WCED), May 2002, at 2. |
| Pg. 52, block 3, line 2 | Add contention that instruction firing times are added to each | This is a substantive change in BIAX's infringement theory. BIAX seeks to accuse a new | Ward Decl. Ex. N, *Intel® Itanium™ Architecture* |

## Intel's Objections to BIAX's Proposed Changes for '945 Patent, Itanium and Itanium 2

| Location of Change in BIAX Ex. D (Part 2 of 3) | Nature of Change to Contention | Basis For Objection | Cite to Public Document (where applicable) |
|---|---|---|---|
| | | or different structure by adding a contention that instruction firing times are added to each instruction "by the Itanium compiler or assembler". | *Assembly Language Reference Guide*, at 31-33 (2001) |
| | instruction "by the Itanium compiler or assembler". | | |
| Pg. 53, block 1, lines 29-30 | Insert citation to Itanium assembler code | This citation supports the substantive change to BIAX's infringement theory objected to in the two rows above. | N/A |
| Pg. 55, block 2, line 1 | Insert a contention covering Itanium's assembler | This is a substantive change to BIAX's infringement theory.  BIAX seeks to accuse a new or different structure by adding a contention covering the Itanium assembler in addition to the Itanium compiler. | Ward Decl. Ex. N, *Intel® Itanium™ Architecture Assembly Language Reference Guide*, at 31-33 (2001) |
| Pg. 55, block 2, line 3 | Changes "execution unit type" to "issue port" | This is a substantive change to BIAX's infringement theory.  BIAX seeks to accuse a new or different structure by changing the accused structure from the Itanium "execution unit type" to the Itanium "issue port". | Ward Decl. Ex. M, *Intel® Itanium® 2 Processor Reference Manual for Software Development and Optimization*, at 26-28 (2004) |
| Pg. 55, block 2, lines 11-12 | Insert citation to Itanium assembler code | This citation supports the substantive change to BIAX's infringement theory objected to in the two rows above. | N/A |
| Pg. 55, block 3, line 1 | Insert a contention covering Itanium's assembler | This is a substantive change to BIAX's infringement theory.  BIAX seeks to accuse a new or different structure by adding a contention covering the Itanium assembler in addition to the Itanium compiler. | Ward Decl. Ex. N, *Intel® Itanium™ Architecture Assembly Language Reference Guide*, at 31-33 (2001) |
| Pg. 55, block | Insert citation to Itanium | This citation supports the substantive change to | N/A |

| | Intel's Objections to BIAX's Proposed Changes for '945 Patent, Itanium and Itanium 2 | | |
|---|---|---|---|
| **Location of Change in BIAX Ex. D (Part 2 of 3)** | **Nature of Change to Contention** | **Basis For Objection** | **Cite to Public Document (where applicable)** |
| 3, lines 4-5 | assembler code | BIAX's infringement theory objected to in the row above. | |
| Pg. 56, block 2, lines 1-2 | Change "11 issue ports" to "the ISD (instruction dispersal) unit" | This is a substantive change in BIAX's infringement theory. BIAX seeks to accuse a new or different structure by changing the identified structure for storing instructions from the "11 issue ports" to "the ISD (instruction dispersal) unit" | Ward Decl. Ex. Q, Intel® Itanium® 2 Processor Hardware Developer's Manual, at 2-4 to 2-5 (2002) |
| Pg. 56, block 2, lines 4-20 | Insert citation to Itanium Merced and McKinley code | This citation supports the substantive change to BIAX's infringement theory objected to in the row above. | N/A |
| Pg. 57, block 2, line 1 | Change "functional units" to "issue ports". | This is a substantive change in BIAX's infringement theory. BIAX seeks to accuse a new or different structure by changing the identified structure from the "functional units" to the "issue ports". | Ward Decl. Ex. M, Intel® Itanium® 2 Processor Reference Manual for Software Development and Optimization, at 26-28 (2004) |
| Pg. 57, block 2, lines 3-6 | Insert citation to Itanium Merced and McKinley code | This citation supports the substantive change to BIAX's infringement theory objected to in the row above. | N/A |
| Pg. 57, block 3, line 1 | Change "functional unit" to "issue port". | This is a substantive change in BIAX's infringement theory. BIAX seeks to accuse a new or different structure by changing the identified structure from the "functional unit" to the "issue port". | Ward Decl. Ex. M, Intel® Itanium® 2 Processor Reference Manual for Software Development and Optimization, at 26-28 (2004) |
| Pg. 57, block 3, lines 4-6; | Insert citation to Itanium Merced and McKinley code | This citation supports the substantive change to BIAX's infringement theory objected to in the row | N/A |

| | Intel's Objections to BIAX's Proposed Changes for '945 Patent, Itanium and Itanium 2 | | |
|---|---|---|---|
| **Location of Change in BIAX Ex. D (Part 2 of 3)** | **Nature of Change to Contention** | **Basis For Objection** | **Cite to Public Document (where applicable)** |
| pg. 58, block 1, line 1 | | above. | |
| pg. 62, block 2, lines 1-2 | Insert a contention covering Itanium's assembler | This is a substantive change to BIAX's infringement theory. BIAX seeks to accuse a new or different structure by adding a contention covering the Itanium assembler in addition to the Itanium compiler. | Ward Decl. Ex. N, *Intel® Itanium™ Architecture Assembly Language Reference Guide*, at 31-33 (2001) |
| Pg. 62, block 2, line 3 | Insert an additional contention that instruction firing times correspond to "stop bits". | This is a substantive change to BIAX's infringement theory. BIAX seeks to accuse a new or different structure by adding a contention that instruction firing times correspond to "stop bits". | Ward Decl. Ex. P, Marsha Eng, et. al, *"Mesocode: Optimizations for Improving Fetch Bandwidth of Itanium Processors"*, Workshop on Complexity-Effective Design (WCED), May 2002, at 2. |
| Pg. 62, block 2, lines 6-8 | Insert citation to Itanium assembler code | This citation supports the substantive change to BIAX's infringement theory objected to in the two rows above. | N/A |
| Pg. 64, block 2, line 2 | Change "11 issue ports" to "the ISD (instruction dispersal) unit" | This is a substantive change in BIAX's infringement theory. BIAX seeks to accuse a new or different structure by changing the identified structure for storing instructions from the "11 issue ports" to "the ISD (instruction dispersal) unit" | Ward Decl. Ex. Q, *Intel® Itanium® 2 Processor Hardware Developer's Manual*, at 2-4 to 2-5 (2002) |
| Pg. 64, block 2, lines 4-18; pg. 65, block | Insert citation to Itanium Merced and McKinley code | This citation supports the substantive change to BIAX's infringement theory objected to in the row above. | N/A |

| Intel's Objections to BIAX's Proposed Changes for '945 Patent, Itanium and Itanium 2 | | | |
|---|---|---|---|
| **Location of Change in BIAX Ex. D (Part 2 of 3)** | **Nature of Change to Contention** | **Basis For Objection** | **Cite to Public Document (where applicable)** |
| 1, lines 1-3 | | | |
| Pg. 65, block 2, lines 1-2 | Change the contention from covering Itanium's "functional units" to covering Itanium's "issue ports and their associated execution resources". | This is a substantive change in BIAX's infringement theory. BIAX seeks to accuse a new or different structure by changing the identified structure from the "functional units" to the "issue ports and their associated execution resources" | Ward Decl. Ex. M, *Intel® Itanium® 2 Processor Reference Manual for Software Development and Optimization*, at 26-28 (2004) |
| Pg. 65, block 2, lines 5-17; Pg. 66, block 1, lines 1-3 | Insert citation to Itanium Merced and McKinley code | This citation supports the substantive change to BIAX's infringement theory objected to in the row above. | N/A |
| pg. 68, block 1, line 1 | Change the contention from covering Itanium's "processor elements" to covering Itanium's "issue ports and their associated execution resources". | This is a substantive change in BIAX's infringement theory. BIAX seeks to accuse a new or different structure by changing the identified structure from the "processor elements" to the "issue ports and their associated execution resources" | Ward Decl. Ex. M, *Intel® Itanium® 2 Processor Reference Manual for Software Development and Optimization*, at 26-28 (2004) |
| Pg. 73, block 2, line 1 | Insert a contention covering Itanium's assembler | This is a substantive change to BIAX's infringement theory.  BIAX seeks to accuse a new or different structure by adding a contention covering the Itanium assembler in addition to the Itanium compiler. | Ward Decl. Ex. N, *Intel® Itanium™ Architecture Assembly Language Reference Guide*, at 31-33 (2001) |
| Pg. 73, block 2, lines 7-9 | Insert citation to Itanium assembler code | This citation supports the substantive change to BIAX's infringement theory objected to in the row above. | N/A |
| Pg. 73, block | Insert a contention covering | This is a substantive change to BIAX's | Ward Decl. Ex. N, *Intel®* |

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**Intel's Objections to BIAX's Proposed Changes for '945 Patent, Itanium and Itanium 2**

| Location of Change in BIAX Ex. D (Part 2 of 3) | Nature of Change to Contention | Basis For Objection | Cite to Public Document (where applicable) |
|---|---|---|---|
| 3, line 1 | Itanium's assembler | infringement theory. BIAX seeks to accuse a new or different structure by adding a contention covering the Itanium assembler in addition to the Itanium compiler. | *Itanium™ Architecture Assembly Language Reference Guide*, at 31-33 (2001) |
| Pg. 73, block 3, line 5 | Changes "execution unit type" to "issue port" | This is a substantive change to BIAX's infringement theory. BIAX seeks to accuse a new or different structure by changing the accused structure from the Itanium "execution unit type" to the Itanium "issue port". | Ward Decl. Ex. M, *Intel® Itanium® 2 Processor Reference Manual for Software Development and Optimization*, at 26-28 (2004) |
| Pg. 73, block 3, line 5 | Change "architectural stops" to "stop bits' | This is a substantive change to BIAX's infringement theory. BIAX seeks to accuse a new or different structure by changing the identified structure from "architectural stops" to "stop bits". | Ward Decl. Ex. P, Marsha Eng, et. al., *"Mesocode: Optimizations for Improving Fetch Bandwidth of Itanium Processors"*, Workshop on Complexity-Effective Design (WCED), May 2002, at 2. |
| Pg. 75, block 1, lines 13-14 | Insert citation to Itanium assembler code | This citation supports the substantive change to BIAX's infringement theory objected to in the three rows above. | N/A |
| Pg. 75, block 2, lines 1-4 | Change the contention from covering Itanium's "functional units" to covering Itanium's "issue ports and their associated execution resources". | This is a substantive change in BIAX's infringement theory. BIAX seeks to accuse a new or different structure by changing the identified structure from the "functional units" to the "issue ports and their associated execution resources" | Ward Decl. Ex. M, *Intel® Itanium® 2 Processor Reference Manual for Software Development and Optimization*, at 26-28 (2004) |
| Pg. 75, block | Insert citation to Itanium Merced | This citation supports the substantive change to | N/A |

| Intel's Objections to BIAX's Proposed Changes for '945 Patent, Itanium and Itanium 2 | | | |
|---|---|---|---|
| Location of Change in BIAX Ex. D (Part 2 of 3) | Nature of Change to Contention | Basis For Objection | Cite to Public Document (where applicable) |
| 2, lines 6-9 | and McKinley code | BIAX's infringement theory objected to in the row above. | |
| Pg. 79, block 2, line 1 | Insert a contention covering Itanium's assembler | This is a substantive change to BIAX's infringement theory. BIAX seeks to accuse a new or different structure by adding a contention covering the Itanium assembler in addition to the Itanium compiler. | Ward Decl. Ex. N, *Intel® Itanium™ Architecture Assembly Language Reference Guide*, at 31-33 (2001) |
| Pg. 79, block 2, lines 8-9 | Insert citation to Itanium assembler code | This citation supports the substantive change to BIAX's infringement theory objected to in the row above. | N/A |
| Pg. 79, block 3, line 1 | Insert a contention covering Itanium's assembler | This is a substantive change to BIAX's infringement theory. BIAX seeks to accuse a new or different structure by adding a contention covering the Itanium assembler in addition to the Itanium compiler. | Ward Decl. Ex. N, *Intel® Itanium™ Architecture Assembly Language Reference Guide*, at 31-33 (2001) |
| Pg. 79, block 3, line 5 | Changes "execution unit types" to "issue ports" | This is a substantive change to BIAX's infringement theory. BIAX seeks to accuse a new or different structure by changing the accused structure from the Itanium "execution unit types" to the Itanium "issue ports". | Ward Decl. Ex. M, *Intel® Itanium® 2 Processor Reference Manual for Software Development and Optimization*, at 26-28 (2004) |
| Pg. 79, block 3, line 5 | Change "architectural stops" to "stop bits' | This is a substantive change to BIAX's infringement theory. BIAX seeks to accuse a new or different structure by changing the identified structure from "architectural stops" to "stop bits". | Ward Decl. Ex. P, Marsha Eng, et. al, *"Mesocode: Optimizations for Improving Fetch Bandwidth of Itanium Processors"*, Workshop on Complexity- |

| | Intel's Objections to BIAX's Proposed Changes for '945 Patent, Itanium and Itanium 2 | | |
| --- | --- | --- | --- |
| **Location of Change in BIAX Ex. D (Part 2 of 3)** | **Nature of Change to Contention** | **Basis For Objection** | **Cite to Public Document (where applicable)** |
| | | | Effective Design (WCED), May 2002, at 2. |
| Pg. 81, block 1, line 13-15 | Insert citation to Itanium assembler code | This citation supports the substantive change to BIAX's infringement theory objected to in the three rows above. | N/A |
| Pg. 81, block 2, lines 1-3 | Change the contention from covering Itanium's "functional units" to covering Itanium's "issue ports". | This is a substantive change in BIAX's infringement theory. BIAX seeks to accuse a new or different structure by changing the identified structure from the "functional units" to the "issue ports" | Ward Decl. Ex. M, *Intel® Itanium® 2 Processor Reference Manual for Software Development and Optimization*, at 26-28 (2004) |
| Pg. 81, block 2, lines 5-15; pg. 82, block 1, lines 1-6 | Insert citation to Itanium Merced and McKinley code | This citation supports the substantive change to BIAX's infringement theory objected to in the row above. | N/A |

## Intel's Objections to BIAX's Proposed Changes for '755 Patent, Hyper-Threading Products

| Location of Change in BIAX Ex. D (Part 3 of 3) | Nature of Change to Contention | Basis For Objection | Cite to Public Document (where applicable) |
|---|---|---|---|
| Pg. 1, block 2, lines 2-3; pg. 2, block 1, lines 1-21 | Added three paragraphs of new contentions relating to the use of thread-ids in the accused products, the presence of two instruction queues, and how the threads are allocated to the instruction queues | This is a substantive change to BIAX's infringement theory. BIAX seeks to accuse a new or different structure by adding a new contention covering the thread-ids and instruction queues used in the accused products. | Ward Decl. Ex. R, Deborah T. Marr, et al, *Hyper-Threading Technology Architecture and Microarchitecture*, at 9-10 (2002) |
| pg. 2, block 1, lines 12, 14-17, 21 | Insert citation to Prescott code | This citation supports the substantive change to BIAX's infringement theory objected to in the row above. | N/A |
| Pg. 2, block 1, lines 23-26 | Removal of contention relating to logical resource drivers having register rename logic and Register Alias Tables. | This is a substantive change to BIAX's infringement theory. BIAX seeks to change positions by removing this contention relating to logical resource drivers having register rename logic and Register Alias Tables. | Ward Decl. Ex. R, Deborah T. Marr, et al, *Hyper-Threading Technology Architecture and Microarchitecture*, at 10 (2002) |
| Pg. 2, block 1, lines 26-27 | Addition of contention that each thread has its own Register Alias Table | This is a substantive change to BIAX's infringement theory. BIAX seeks to accuse a new or different structure by adding contention that each thread has its own Register Alias Table. | Ward Decl. Ex. R, Deborah T. Marr, et al, *Hyper-Threading Technology Architecture and Microarchitecture*, at 10 (2002) |
| Pg. 3, block 1, lines 1-9 | Removal of contention relating to how the logical resource drivers add thread information to instructions, via the TC entries. | This is a substantive change to BIAX's infringement theory. BIAX seeks to seeks to change positions by removing this contention relating to how the logical resource drivers add | Ward Decl. Ex. R, Deborah T. Marr, et al, *Hyper-Threading Technology Architecture and Microarchitecture*, at 9 (2002) |

| Location of Change in BIAX Ex. D (Part 3 of 3) | Nature of Change to Contention | Basis For Objection | Cite to Public Document (where applicable) |
|---|---|---|---|
| | | thread information to instructions, via the TC entries. | |
| Pg. 3, block 2, lines 14-16 | Insert citation to Prescott code | This citation supports the substantive change to BIAX's infringement theory objected to in the row above. | N/A |
| Pg. 3, block 2, lines 18-20 | Removal of contention relating to how the DTLB is used to translate addresses to physical addresses. | This is a substantive change to BIAX's infringement theory. BIAX seeks to seeks to change positions by removing this contention relating to how the DTLB is used to translate addresses to physical addresses. | Ward Decl. Ex. R, Deborah T. Marr, et al, *Hyper-Threading Technology Architecture and Microarchitecture*, at 11 (2002) |
| Pg. 3, block 3, line 1; pg. 4, block 1, line 1 | Changing contention that Intel Hyper-Threading processors have "a plurality of execution units" to contention that the processors have "three ports, each port having execution units" | This is a substantive change to BIAX's infringement theory. BIAX seeks to accuse a new or different structure by changing the contention to add the "three ports" (i.e. issue ports). | Ward Decl. Ex. L, *The Microarchitecture of the Pentium 4 Processor*, Intel Technology Journal Vol. 5, Issue 1, February, 2001, at 7-8 |
| Pg. 4, block 4, lines 1-4 | Insert citation to Prescott code | This citation supports the substantive change to BIAX's infringement theory objected to in the row above. | N/A |
| Pg. 4, block 1, lines 16-19 | Remove contention that Figure 6 "shows three execution units receiving simple instructions from two logical resource drivers. Each logical resource driver includes its own register rename block. The execution | This is a substantive change to BIAX's infringement theory. BIAX seeks to seeks to change positions by removing this contention relating to how the execution units receive instructions from the logical resource drivers. | Ward Decl. Ex. R, Deborah T. Marr, et al, *Hyper-Threading Technology Architecture and Microarchitecture*, at 10 (2002) |

| Location of Change in BIAX Ex. D (Part 3 of 3) | Nature of Change to Contention | Basis For Objection | Cite to Public Document (where applicable) |
|---|---|---|---|
| | units receive simple instructions and complex instructions decoded into uops in a determined order." | | |
| Pg. 4, block 1, lines 21-22 | Addition of contention that Figure 6 "shows three execution units receiving instructions from the two queues. The ports and their execution units receive instructions in a determined order." | This is a substantive change to BIAX's infringement theory. BIAX seeks to accuse a new or different structure by adding a different contention relating to how the ports and execution units receive instructions from the queues. | Ward Decl. Ex. R, Deborah T. Marr, et al, *Hyper-Threading Technology Architecture and Microarchitecture*, at 10 (2002) |
| Pg. 5, block 1, line 2 | Changes "execution unit" to "port" | This is a substantive change to BIAX's infringement theory. BIAX seeks to accuse a new or different structure by changing the structure identified as corresponding to the claim element. | Ward Decl. Ex. L, *The Microarchitecture of the Pentium 4 Processor*, Intel Technology Journal Vol. 5, Issue 1, February, 2001, at 7-8 |
| Pg. 5, block 1, line 7 | Inserts "ports and their" before "execution units" | This a substantive change to BIAX's infringement theory. BIAX seeks to accuse a new or different structure by changing the structure identified as corresponding to the claim element, to add additional structure. | Ward Decl. Ex. L, *The Microarchitecture of the Pentium 4 Processor*, Intel Technology Journal Vol. 5, Issue 1, February, 2001, at 7-8 |
| Pg. 5, block 1, lines 8-10 | Replaces "user context information added to the simple instructions and complex instructions decoded into uops" with "thread-ids added to the instructions" | This a substantive change to BIAX's infringement theory. BIAX seeks to accuse a new or different structure by changing the structure (user context information, simple instructions, complex instructions decoded into uops) identified as corresponding to the claim element, to add different | Ward Decl. Ex. R, Deborah T. Marr, et al, *Hyper-Threading Technology Architecture and Microarchitecture*, at 9 (2002) |

| Location of Change in BIAX Ex. D (Part 3 of 3) | Nature of Change to Contention | Basis For Objection | Cite to Public Document (where applicable) |
|---|---|---|---|
| | | structure (thread-ids, instructions). | |
| Pg. 5, block 1, lines 10-12 | Insert citation to Prescott code | This citation supports the substantive change to BIAX's infringement theory objected to in the row above. | N/A |
| Pg. 5, block 1, lines 14-15; pg. 6, block 1, lines 1-2 | Removal of contention describing the execution units and how they receive data to work on. | This is a substantive change to BIAX's infringement theory. BIAX seeks to seeks to change positions by removing this contention relating to how the execution units receive their data. | Ward Decl. Ex. L, *The Microarchitecture of the Pentium 4 Processor*, Intel Technology Journal Vol. 5, Issue 1, February, 2001, at 7-8 |